

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

RUSTEM KAZAZI; LEJLA KAZAZI; and  
ERALD KAZAZI,

*Movants,*

v.

U.S. CUSTOMS AND BORDER  
PROTECTION; UNITED STATES OF  
AMERICA; KEVIN McALEENAN,  
Commissioner, U.S. Customs and Border  
Protection, sued in his official capacity;  
TIMOTHY STARK, agent of U.S. Customs  
and Border Protection, sued in his individual  
capacity; and UNKNOWN AGENTS OF U.S.  
CUSTOMS AND BORDER PROTECTION,  
sued in their individual capacities

*Respondents.*

Case No. 1:18-mc-51

Judge Dan Aaron Polster

**DECLARATION OF  
PATRICK T. LEWIS**

Patrick T. Lewis hereby declares and states as follows:

1. This declaration is made in support of Movants' motion for attorney fees in the above-entitled matter.
2. I am a partner of the firm Baker & Hostetler LLP and resident in the Firm's Cleveland, Ohio office. The focus of my practice is financial services litigation, although I have significant experience with civil rights litigation.
3. I am a member in good standing of the bar of the Supreme Court of Ohio, the Northern District of Ohio, the Sixth Circuit Court of Appeals, and numerous other jurisdictions. I am a 2004 *cum laude* graduate of Harvard Law School and a 2000 *summa cum laude* graduate of the College of William & Mary in Williamsburg, VA.
4. In this action, I served as local counsel on behalf of the Movants. In that capacity, I advised attorneys from the Institute for Justice about local practice, reviewed draft pleadings and other papers for filing, and provided similar assistance to Movants.
5. I have personal knowledge of all facts stated herein and, if called upon to testify, I could and would competently testify to them.

6. I have maintained contemporaneous time records for my work on this case in the ordinary course of my practice. I have reviewed these records and believe them to be true, accurate, and complete. My time records through June 8, 2018 have been produced.

7. The time I spent on this action is reasonable and consistent with the scope of my representation of the Movants in this action. The hourly rate for which I seek compensation in this case, \$435, is the standard hourly rate charged for my time by my Firm in 2018.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed this 12<sup>th</sup> day of December, 2018, at Cleveland, Ohio.

/s/ Patrick T. Lewis

Patrick T. Lewis

# BakerHostetler

Rustem Kazazi  
6348 Greenbrier Dr  
Cleveland, OH 44130

Invoice Date: 12/5/2018  
Invoice Number: 1205-001  
B&H File Number: 111776/098901  
Tax ID Number: 34-0082025  
Page 1

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**Regarding:**

**For Professional services rendered through June 8, 2018**

**Fees: 5,355.00**

**Expenses and Other Charges:**

Copier / Duplication (E101)	<b>335.40</b>
Postage (E108)	<b>181.73</b>
Color Copier (E101)	<b>738.50</b>
Filing Fees (E112)	<b>287.00</b>
	<hr/>
	<b>1,542.63</b>

**Balance for this invoice due by 1/3/2019 \$6,897.63**

**Please Remit To:**  
**Baker & Hostetler LLP**  
**P.O. Box 70189**  
**Cleveland, OH 44190-0189**

**Reference Invoice No:**  
**50525761**

**FOR WIRE REMITTANCES:**  
**Baker & Hostetler LLP**  
**KeyBank, N.A., Cleveland, OH**  
**Account No: 1001516552 / ABA 041001039**  
**SWIFT Code: KEYBUS33**

**Email the "Remittance Copy" to**  
**bakerlockbox@bakerlaw.com**

Rustem Kazazi

Invoice Date: 12/5/2018  
 Invoice Number: 1205-001  
 Matter Number: 111776.098901  
 Page 2

Date	Name	Description	Hours	Rate	Amount
05/04/2018	Lewis Patrick T	Strategize with Mr. Hottot regarding upcoming litigation.	0.50	435.00	217.50
05/24/2018	Lewis Patrick T	Contact Northern District of Ohio clerk regarding filing procedures; review draft pleadings; correspond with client.	0.75	435.00	326.25
05/25/2018	Lewis Patrick T	Review and analysis of complaint and declarations; confer with Mr. Hottot and Ms. Talcott regarding litigation strategy.	1.50	435.00	652.50
05/30/2018	Bhagat Ashish K.	Duplication of discs per Mr. Lewis.	1.00	205.00	205.00
05/30/2018	Lewis Patrick T	Assist with preparation of Rule 41(g) motion filing.	1.50	435.00	652.50
05/31/2018	Bhagat Ashish K.	Duplication of discs per Mr. Lewis.	1.25	205.00	256.25
05/31/2018	Lewis Patrick T	Attention to filing Rule 41(g) motion and attendant filings; confer with co-counsel; call from Judge Polster's chambers.	2.75	435.00	1,196.25
06/04/2018	Lewis Patrick T	Review and follow up on media inquiries and other matters.	0.50	435.00	217.50
06/05/2018	Lewis Patrick T	Confer with court and team members regarding upcoming court conference and other matters.	0.50	435.00	217.50
06/07/2018	Lewis Patrick T	Prepare for call with Judge Polster, including review of briefing and preparation of IJ co-counsel; participate in call with Judge Polster; follow-up regarding same.	1.75	435.00	761.25
06/08/2018	Lewis Patrick T	Prepare for and participate in conference call with Judge Polster regarding the litigation and potential settlement; follow-up with IJ regarding same.	1.50	435.00	652.50
<b>Total Fees:</b>					<b>5,355.00</b>